

Jeffrey D. Schreiber, Esq. CSBN 149083
 4275 Executive Square
 Suite 200
 La Jolla, California 92037
 Telephone: (858) 643-9011
 Facsimile: (858) 263-1255

Attorney for Creditor
 Karen Kaemmer

UNITED STATES BANKRUPTCY COURT
 Southern District of California

In re:)	Case No. 14-05810-LT13
RASHID R. ALIYEB, DILBAR B. MAMEDOVA)	CREDITOR KAREN KAEMMER'S
)	PROPOSED EXHIBIT LIST
Debtors.)	
)	
)	

Creditor Karen Kaemmer, submits her proposed list of exhibits to be presented at trial.

EXHIBIT NO.	DATE SUBMITTED	DATE ADMITTED	GROUND FOR OBJECTION	DESCRIPTION
1	March 17, 2015			Declaration Of Rosemary Aljundi
2	March 17, 2015			Proof Of Claim Of Karen Kaemmer

DATED: March 17, 2015

/s/ Jeffrey D. Schreiber

CREDITOR KAREN KAEMMER PROPOSED EXHIBIT LIST

EXHIBIT “1”

1 Jeffrey D. Schreiber, Esq. CSBN 149083
The Schreiber Law Firm
2 4275 Executive Square
Suite 200
3 La Jolla, California 92037
Telephone: (858) 643-9011
4 Facsimile: (858) 536-1944

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6 Attorney for Creditor
Karen Kaemmer

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9 UNITED STATES BANKRUPTCY COURT
Southern District of California

10 In re:)	Case No. 14-07165-LT13
)	
11 RASHID R. ALIYEB, DILBAR B. MAMEDOVA)	DECLARATION OF ROSEMARY
)	ALJUNDI RE: VALUATION OF
12 Debtors.)	MOBILE HOME LOCATED AT
)	1315 PEPPER DRIVE SPACE 86
)	EL CAJON, CALIFORNIA
)	
)	
)	DATE: January 13, 2015
)	TIME: 2:00 p.m.
)	PLACE: DEPT. 3 Room 129
)	Hon. Laura S. Taylor

16
17 I, Rosemary Aljundi, declare as follows:

18 1. I am over the age of 18 years and declare under penalty of perjury that the following
19 based on my personal knowledge is true such that if I were called upon to testify, I would and could
20 so testify thereto.

21 2. I am the owner of Mobile Home Connection. Mobile Home Connection operates as
22 an broker/agent for buyers and sellers for sales of in-park mobile homes. I have operated Mobile
23 Home Connection representing buyers and sellers continuously for 24 years and have represented
24 buyers and sellers in several thousands of transactions. Mobile Home Connection represents
25 buyers and sellers primarily in east and south San Diego County.

26 3. I use this sales experience for determining the best price for sellers to list their
27 mobile home for sale and determining the offering price for buyers. I have also been called upon
28 by several attorneys or their clients to provide them a value to be used in bankruptcy cases and

1 have provided written valuations for that purpose. Based on that sales experience I am familiar
2 with the current sales prices and market value of mobile homes in El Cajon, California.

3 4. I have been requested to provide a valuation for the mobile home located at 1315
4 Pepper Drive, Space 86, El Cajon, San Diego County, California. This mobile home is a 2007
5 Silvercrest double wide with a combined width of 24 feet and a length of 56 feet. It has a covered
6 driveway, built on front porch and railing, plantings in the front, full skirting and appears from the
7 exterior to be of good to better than average condition. This mobile home is located in the Pepper
8 Villa mobile home park. In making my determination of value, I used comparable sales in Pepper
9 Villa in arms-length transactions between unrelated buyers and sellers, which is given primary
10 weight, as well as mobile homes in similar mobile home parks in the area, taking into account in
11 all cases the age, manufacturer, square footage, maintenance condition and park rents.

12 5. In the past two to three years, as is the case with real estate, the values of mobile
13 homes have been increasing. Mobile home values do increase based on supply and demand and
14 is driven by the lack of any new desirable mobile home parks available limiting supply to homes in
15 existing parks or by purchasing and locating a new mobile home in spaces which become available
16 in existing parks.

17 6. The first comparable is a mobile home located at space 40 in Pepper Villa where
18 the subject mobile home is located. This mobile home is a 2005 Hallmark, the same width as the
19 subject mobile home but is two feet shorter, and is otherwise very comparable to the subject
20 mobile home. This mobile home sold on March 7, 2014 for \$79,000.00.

21 7. The second comparable is a mobile home located at space 39 in Pepper Villa
22 where the subject mobile home is located. This mobile home is a 1997 Baron and is two feet eight
23 inches wider than the subject mobile home and is the same length. While this mobile home is
24 older, it is a just slightly more desirable than the subject mobile home in terms of manufacturer of
25 the mobile home and interior construction materials used. This mobile home sold on July 30, 2014
26 for \$85,700.00.

27 8. I also took into account sales of similar homes in other mobile home parks in the
28 same area of El Cajon where the subject property is located. These are sales where I am

1 personally familiar with the mobile home sold and the sale price and terms of the sale.

2 9. Using these comparable sales in the same park as well as mobile homes in similar
3 parks in the area, it is my opinion that the subject property had a fair market value as of September
4 4, 2014 of no less than eighty thousand dollars (\$80,000.00).

5 I declare under penalty of perjury under the laws of the State of California that the foregoing
6 is true and correct.

7 Executed this 17th day of November, 2014 at Santee, California.

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9 /s/ Rosemary Aljundi
10 Rosemary Aljundi, Declarant
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EXHIBIT "2"

B10 (Official Form 10) (04/13)

UNITED STATES BANKRUPTCY COURT SOUTHERN DISTRICT OF CALIFORNIA		PROOF OF CLAIM
Name of Debtor: Rashid R. Aliyeb Dilbar B. Mamedova		Case Number: 14-07165-LT13
NOTE: Do not use this form to make a claim for an administrative expense that arises after the bankruptcy filing. You may file a request for payment of an administrative expense according to 11 U.S.C. § 503.		
Name of Creditor (the person or other entity to whom the debtor owes money or property): Karen Kaemmer		COURT USE ONLY
Name and address where notices should be sent: Jeffrey D. Schreiber 4275 Executive Square, Suite 200 La Jolla, CA 92037 Telephone number: 858.643.9011 email: jkschreiber@theschreiberlawfirm.com		
Name and address where payment should be sent (if different from above): Telephone number: email:		<input type="checkbox"/> Check this box if this claim amends a previously filed claim. Court Claim Number: _____ (If known) Filed on: _____
1. Amount of Claim as of Date Case Filed: <u>\$206,849.70</u> If all or part of your claim is secured, complete item 4. If all or part of your claim is entitled to priority, complete item 5. <input checked="" type="checkbox"/> Check this box if claim includes interest or other charges in addition to the principal amount of claim. Attach a statement that itemizes interest or charges.		
2. Basis for Claim: <u>Money Lent</u> (See instruction #2)		
3. Last four digits of any number by which creditor identifies debtor: _____	3a. Debtor may have scheduled account as: FCI National Lender Services (See instruction #3a)	3b. Uniform Claim Identifier (optional): _____ (See instruction #3b)
4. Secured Claim (See instruction #4) Check the appropriate box if the claim is secured by a lien on property or a right of setoff, attach required redacted documents, and provide the requested information. Nature of property or right of setoff: <input type="checkbox"/> Real Estate <input type="checkbox"/> Motor Vehicle <input checked="" type="checkbox"/> Other Describe: Mobile Home Value of Property: \$ 80,000.00 Annual Interest Rate: 16 % <input checked="" type="checkbox"/> Fixed or <input type="checkbox"/> Variable (when case was filed)		
Amount of arrearage and other charges, as of the time case was filed, included in secured claim, if any: <div style="text-align: right;">\$ 206,849.70</div> Basis for perfection: Lien filed with Housing & Community Development Amount of Secured Claim: \$ 80,000.00 Amount Unsecured: \$ 126,849.70		
5. Amount of Claim Entitled to Priority under 11 U.S.C. §507(a). If any part of the claim falls into one of the following categories, check the box specifying the priority and state the amount.		
<input type="checkbox"/> Domestic support obligations under 11 U.S.C. §507(a)(1)(A) or (a)(1)(B).--	<input type="checkbox"/> Wages, salaries, or commissions (up to \$12,475*) earned within 180 days before the case was filed or the debtor's business ceased, whichever is earlier - 11 U.S.C. §507(a)(4).	<input type="checkbox"/> Contributions to an employee benefit plan - 11 U.S.C. §507(a)(5).
<input type="checkbox"/> Up to \$2,775* of deposits toward purchase, lease, or rental of property or services for personal, family, or household use - 11 U.S.C. §507(a)(7).	<input type="checkbox"/> Taxes or penalties owed to governmental units - 11 U.S.C. §507(a)(8).	<input type="checkbox"/> Other - Specify applicable paragraph of 11 U.S.C. §507 (a)().
Amount entitled to priority: \$ _____		
*Amounts are subject to adjustment on 4/01/16 and every 3 years thereafter with respect to cases commenced on or after the date of adjustment.		
6. Credits. The amount of all payments on this claim has been credited for the purpose of making this proof of claim. (See instruction #6)		

B10 (Official Form 10) (04/13)

7. Documents: Attached are **redacted** copies of any documents that support the claim, such as promissory notes, purchase orders, invoices, itemized statements of running accounts, contracts, judgments, mortgages, security agreements, or, in the case of a claim based on an open-end or revolving consumer credit agreement, a statement providing the information required by FRBP 3001(c)(3)(A). If the claim is secured, box 4 has been completed, and **redacted** copies of documents providing evidence of perfection of a security interest are attached. If the claim is secured by the debtor's principal residence, the Mortgage Proof of Claim Attachment is being filed with this claim. (See instruction #7, and the definition of "redacted".)

DO NOT SEND ORIGINAL DOCUMENTS. ATTACHED DOCUMENTS MAY BE DESTROYED AFTER SCANNING.

If the documents are not available, please explain:

8. Signature: (See instruction #8)

Check the appropriate box.

☐ I am the creditor.

☒ I am the creditor's authorized agent.

☐ I am the trustee, or the debtor, or their authorized agent.
(See Bankruptcy Rule 3004.)

☐ I am a guarantor, surety, indorser, or other codebtor.
(See Bankruptcy Rule 3005.)

I declare under penalty of perjury that the information provided in this claim is true and correct to the best of my knowledge, information, and reasonable belief.

Print Name: **Jeffrey D. Schreiber**

Title: _____

Company: **The Schreiber Law Firm**

/s/ Jeffrey D. Schreiber
(Signature)

September 24, 2014
(Date)

Address and telephone number (if different from notice address above):

**4275 Executive Square, Suite 200
La Jolla, CA 92037**

Telephone number: **858.643.9011**

email: **jschreiber@theschreiberlawfirm.com**

Penalty for presenting fraudulent claim: Fine of up to \$500,000 or imprisonment for up to 5 years, or both. 18 U.S.C. §§ 152 and 3571.

Principal Balance Due (Matured):	\$111,930.00
Interest only payments of \$1,492.00 each due July 1, 2009 through March 1, 2012	\$ 49,249.20
Interest from maturity date to petition date	<u>\$ 45,670.50</u>
Total	\$206,849.70